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Attorneys for Defendants  
AT&T Services, Inc. and AT&T Inc.,  
Appearing Specially

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Herring Networks, Inc.,

Plaintiff,

v.

AT&T Inc. a Delaware corporation; and  
AT&T Services, Inc., a Delaware  
corporation,

Defendants.

Case No. 2:16-cv-01636

**DECLARATION OF MARCELLUS  
MCRAE IN SUPPORT OF  
AT&T INC.'S MOTION TO DISMISS  
COMPLAINT FOR LACK OF  
PERSONAL JURISDICTION [F.R.C.P.  
12(b)(2)]**

**Hearing:**

Date: June 27, 2016  
Time: 10:00 a.m.  
Place: Courtroom No. 5  
Judge: Hon. Christina Snyder

1 I, Marcellus McRae, pursuant to 28 U.S.C. § 1746, declare:

2 1. I am an attorney duly licensed to practice law in the State of California. I am a  
3 partner at Gibson, Dunn & Crutcher LLP and lead counsel for Defendant AT&T  
4 Services, Inc. and Defendant AT&T Inc. (Defendant AT&T Inc. appears specially) in  
5 the above-captioned matter. I respectfully submit this declaration in support of  
6 Defendant AT&T Inc.'s Motion to Dismiss Complaint for Lack of Personal  
7 Jurisdiction, filed April 25, 2016. I have personal knowledge of the matters stated  
8 herein and, if called upon to do so, could and would competently testify thereto.

9 2. During the parties' meet and confer, I informed plaintiff's counsel that it was my  
10 understanding that AT&T Inc. does not have any employees. And when plaintiff's  
11 counsel asked me for which entity Mr. Cicconi worked, I replied that I did not know. I  
12 did not refuse to answer that question.

13 I declare, under penalty of perjury under the laws of the United States of  
14 America, that these facts are true and correct and that this Declaration is executed this  
15 13th day of June, 2016, at Los Angeles, California.

16  
17 /s/ Marcellus McRae  
18 Marcellus McRae  
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